REMARKS/ARGUMENTS

Before this amendment, claims 1, 2, 4-6, and 8-21 were present for examination. No claims are amended, canceled, or added by this paper. Therefore claims 1, 2, 4-6, and 8-21 are present for examination, and claims 1, 6, and 16 are the independent claims.

Applicants respectfully request entry of this amendment and further consideration of the application.

Rejection under 35 U.S.C. § 102(e)

The Final Office Action mailed July 10, 2008, has rejected all pending claims 1, 2, 4-6 and 8-21 under 35 U.S.C. 102(e) as being allegedly anticipated by U.S. Pat. App. Pub. No. 2003/0187783to Arthus ("Arthus"). Applicants respectfully traverse because Arthus does not disclose, either expressly or inherently, each and every element of Applicants' claims.

Applicants' invention is directed to detecting *account acquisition fraud.* As is explained in Applicants' specification, account acquisition is the opening of an account. (Specification paragraph [0005]). The present invention aims to detect a kind of fraud wherein a person or entity opens several stored value accounts that are spread across multiple issuers and that are funded from the same *load source.* A load source is the bank or other account used by the person opening the account to provide the funds that are loaded into the stored value accounts. (Specification paragraph [0036]) A large number of stored value accounts being opened with payment from a single load source may indicate that fraud is occurring. However, if the accounts are spread among multiple issuers, no single issuer may detect any unusual activity. The invention provides a way for the issuers to share information cooperatively, so that this kind of fraud may be detected.

Claims 1, 2, 4, and 5

In the language of claim 1, a *first analysis engine is associated with a first stored value product.* A *second analysis engine is associated with a second stored value product from a different issuer than an issuer of the first stored value product.* As is shown in Figure 1, these analysis engines may be associated with the separate issuers.

A *cross monitor is operable to accept a first transaction information from the first analysis engine about a first transaction with the first stored value product and a second transaction information from the second analysis engine about a second transaction with the second stored value product, wherein the first transaction information is provided from the cross monitor to the second analysis engine.* That is, the cross monitor passes transaction information between the two analysis engines. This cross monitor makes the connection between the two issuers.

The second analysis engine can then *recognize a common load source account to associate the transactions and determine a transaction velocity from the first and second transaction information.* That is, the second analysis engine, associated with one of the issuers, recognizes that multiple stored value accounts have been opened and funded from the same load source. This can be recognized even if the multiple accounts were opened at multiple issuers, because of the information transfer performed by the cross monitor. The second analysis engine then determines a *transaction velocity*, which is an indication of the amount of activity associated with an account. (Specification paragraph [0029])

Finally, the method includes *stalling the second transaction when the transaction velocity exceeds a velocity threshold.* This stalling permits further analysis of the transaction. (Specification paragraph [0042])

In summary, in the present invention, issuers cooperate to detect fraud perpetrated by persons opening accounts.

By contrast, Arthus describes a system for detecting fraud perpetrated by merchants (not account holders). (See Arthus paragraph [0005]). While the system of Arthus monitors multiple merchants, Arthus does not describe any cross monitoring. That is, Arthus gives no indication that activities of one merchant or account can reflect on another.

The system of Arthus gathers data for "later evaluation". (Arthus paragraph [0042]) As such, Arthus lacks the real-time aspect reflected in Applicants' claims, and does not stall any transaction in progress.

Furthermore, Arthus does not describe any analysis of the *load source* used to fund a stored value account.

Thus, several elements of Applicants' claim 1 are missing from Arthus, and Arthus does not anticipate Applicants' claim 1.

In support of the rejection, the Office Action cites various portions of Arthus, but the cited portions are for the most part unrelated to the claim terms for which they are cited. For example, the Office Action cites paragraph [0042] of Arthus for disclosing *stalling the second transaction when the transaction velocity exceeds a velocity threshold*. However, Arthus' paragraph [0042] describes gathering various kinds of transaction information for "later evaluation". This paragraph does not even suggest any analysis of whether the transaction information indicates that any *velocity threshold* is reached, and certainly does not disclose *stalling* a transaction. The fact that Arthus gathers data for "later evaluation" indicates that Arthus lacks the real-time aspect of stalling a transaction in progress.

In another example, the Office Action cites Arthus' paragraphs [0057], [0030], [0042], and [0049] as disclosing a *cross monitor* that passes information between two analysis engines. Paragraph [0057] describes various reports that Arthus' system can produce, and is unrelated to any cross monitoring. Paragraph [0030] indicates that a merchant's activities can be monitored, but completely lacks any suggestion of a *cross monitor* that passes information between analysis engines. Paragraph [0042] describes collection of transaction information, but does not indicate that the transaction information is shared among issuers. Paragraph [0049] describes part of the user interface of Arthus' system. None of the cited passages even suggests a cross monitor *operable to accept a first transaction information from the first analysis engine about a first transaction with the first stored value product and a second transaction information from the second analysis engine about a second transaction with the second stored value product, wherein the first transaction information is provided from the cross monitor to the second analysis engine.*

Neither the cited passages nor any other part of Arthus discloses these claim elements, and claim 1 and its dependents are not anticipated by Arthus.

Claims 6 and 8-15

Independent claim 6 is a method claim that describes cross monitoring and associating suspicious behavior based on a common load source account. As is explained above with respect to claim1 , at least these elements of claim 6 are missing from Arthus, and claim 6 and its dependents are not anticipated by Arthus.

Claims 16-21

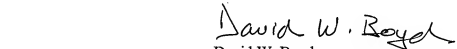
Independent claim 16 also recites a *cross monitor* that associates information from separate issuers based on *load source account information*. As is explained above with respect to claim 1, these aspects are missing from Arthus. Claim 16 and its dependents are not anticipated by Arthus.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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